

JONATHAN O. PENA, ESQ.
CA Bar ID No. 278044
Peña & Bromberg, PLC
2440 Tulare St., Suite 320
Fresno, CA 93721
Telephone: 559-412-5390
Fax: 866-282-6709
info@jonathanpena.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Larese Marie Johnson Armstrong,
Plaintiff,
vs.
Kilolo Kijakazi, Acting
Commissioner of Social Security,
Defendant.

} Case No. 1:21-cv-00341-DAD-BAM

} STIPULATION AND
ORDER FOR EXTENSION OF
TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from December 22, 2021 to February 22, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S OPENING BRIEF. Defendant will file Opposition brief on March 24, 2022, and Plaintiff's Reply will be filed April 8, 2022.

1 This is Plaintiff's first request for an extension of time. Good cause exists
2 for this extension. Counsel has recently received a greater number of Answers and
3 Certified Administrative Records from defendant in cases in this district, and the
4 three other California Districts, each of which require settlement negotiations or
5 merit briefing. Counsel has a greater than usual number of merit briefs due in
6 December 2021. In the Eastern District of California alone, Counsel received 47
7 Certified Administrative Records in November 2021.

8 As to merit briefs, for the week of December 20, 2021, Counsel has one
9 letter brief and EAJA Motions. Also, Counsel has preplanned vacation days for
10 the Christmas holidays.

11 Due to Counsel's attempt to spread out the significant increase of briefs due
12 for prior months, in the month of January 2022, Plaintiff's Counsel has 25 merit
13 briefs.

14 In addition, Counsel is responsible for reviewing AC denials for possible
15 filing in US District Court. Counsel has received an unusual and ever-increasing
16 number of AC denials which require a review for possible filing in US District
17 Court.

18 Due to the increase in certified administrative records being filed by
19 defendant, Counsel for Plaintiff has a larger than usual number of briefs due for the
20 month of December 2021 and January 2022.

21 Counsel for the Plaintiff does not intend to further delay this matter.
22 Defendant does not oppose the requested extension. Counsel apologizes to the
23 Defendant and Court for any inconvenience this may cause.

28 || By: /s/ Jonathan Omar Pena

1 JONATHAN OMAR PENA
2 Attorneys for Plaintiff
3

4 Dated: December 11, 2021 PHILLIP A. TALBERT
5 Acting United States Attorney
6 PETER K. THOMPSON
7 Regional Chief Counsel, Region IX
Social Security Administration

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9 By: */s/ Carol S. Clark
10 Carol S. Clark
11 Special Assistant United States Attorney
12 Attorneys for Defendant
(*As authorized by email on December 10, 2021)

ORDER

Pursuant to stipulation, and good cause appearing, Plaintiff's request for a 60-day extension of time to file an Opening Brief is GRANTED. Plaintiff shall file and serve an Opening Brief on or before February 22, 2022. Defendant shall file and serve an opposition, if any, on or before March 24, 2022. Plaintiff shall file and serve any reply on or before April 8, 2022.

IT IS SO ORDERED.

Dated: December 13, 2021

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE